

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

In re: BAIR HUGGER FORCED AIR
WARMING DEVICES PRODUCTS
LIABILITY LITIGATION

MDL No. 15-2666 (JNE/FLN)

This Document Relates To:
All Actions

**DECLARATION OF MARY S. YOUNG
IN SUPPORT OF DEFENDANTS'
OPPOSITION TO PLAINTIFFS'
MOTION TO EXCLUDE THE
OPINIONS AND TESTIMONY OF
RICHARD P. WENZEL, M.D.**

Mary S. Young, being first duly sworn, deposes and declares:

I am an attorney at the law firm of Blackwell Burke P.A., and one of the attorneys representing 3M Company and Arizant Healthcare Inc. (together, "Defendants") in this litigation. I submit this declaration in support of Defendants' Opposition to Plaintiffs' Motion to Exclude the Opinions and Testimony of Richard P. Wenzel, M.D. Unless otherwise stated, the facts set forth herein are based upon my personal knowledge, information, and belief.

1. Attached as Defendants' Exhibit DX1 is a true and correct copy of Dr. Richard Wenzel's Expert Report dated June 2, 2017 and Dr. Richard Wenzel's Supplemental Expert Report dated September 7, 2017.

2. Attached as Defendants' Exhibit DX2 is a true and correct copy of the transcript of the Deposition of Richard P. Wenzel, M.D., MSc., taken August 4, 2017.

3. Attached as Defendants' Exhibit DX3 is a true and correct copy of excerpts of the transcript of the Deposition of Mark Albrecht taken October 7, 2016.

4. Attached as Defendants' Exhibit DX4 is a true and correct copy of Exhibit 5 from the deposition of Dr. William Jarvis, which is a publication entitled Mangram, A., et al., "Guideline for prevention of surgical site infection, 1999" 27.2 *American Journal of Infection Control* 97 (1999).

5. Attached as Defendants' Exhibit DX5 is a true and correct copy of Greenhalgh T., *How to read a paper, Getting your bearings (deciding what the paper is about)*, BMJ 1997, 315:243-6.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: October 3, 2017

Respectfully submitted,

s/Mary S. Young

Mary S. Young